

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	CASE NO. 4:22CR3077
)	
Plaintiff,)	
)	MOTION TO REVIEW
v.)	DETENTION
)	
NEIL SURESH CHANDRAN,)	
)	
Defendant.)	

The Defendant, Neil Suresh Chandran, hereby moves the Court to review his detention and in support of this motion states as follows:

1. The Defendant is charged in a five count indictment with three counts of wire fraud and two counts of engaging in monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1343 and 18 U.S.C. § 1957 respectively.

2. Mr. Chandran was detained at his initial appearance in the United States District Court for the Central District of California on June 29, 2022.

3. Since the detention hearing, information now exists that was not known to the movant at the time of the hearing that has a material bearing on the issue whether there are conditions of release that will reasonably assure the appearance of Mr. Chandran as required. 18 U.S.C. § 3142(f)(2)(B).

4. At the time of Mr. Chandran's initial pretrial services interview, the pretrial services officer was not able to verify information from his ex-wife or his sister. Additionally, Mr. Chandran was not represented by counsel at the detention hearing.

5. The undersigned counsel has confirmed with the Defendant's ex-wife,

Jennifer Chandran, that if released he could reside with her at her home in Las Vegas, Nevada. Ms. Chandran resides in a single family home with her and Mr. Chandran's minor son. The home is a suitable home with no firearms present. Mr. Chandran does not use alcohol or drugs. The United States Pretrial Services Office has been provided with contact information for Ms. Chandran.

6. Ms. Chandran also agrees to serve as a Third Party Custodian for Neil Chandran to assist the Court in this case.

7. Mr. Chandran previously was charged and convicted in Nassau County, Long Island on June 23, 2018 of grand larceny in the 2nd degree. Mr. Chandran complied with all the terms of the bail conditions in this case and paid the restitution order entered by the Court.

8. Although Mr. Chandran does not have employment secured at the present time, upon his release he represents to the Court that he will obtain full time employment if permitted by the Court's order of release.

9. The Defendant is a lawful permanent resident of the United States and he has no intention of leaving the United States during the pendency of this case. The United States has confiscated his passports and he will request only that the government return his permanent residency card to assist in his employment.

10. This is not a case that involves a crime of violence, an offense under the controlled substance act or minor victims. There is no presumption in favor of detention in this case and the Defendant does not pose a risk of flight. Certainly, conditions exist that will reasonably assure Mr. Chandran's appearance as required

for future court proceedings. There is no risk to the safety of any person or the community that will be endangered by his release.

11. In this case, this Court should be guided by the Administrative Office of the U.S. Court statistics showing that nearly everyone released pending trial appears in court and does not reoffend. In fact, in 2019, 99% of released federal defendants nationwide appeared for court as required and 98% did not commit new crimes on bond. Table H-15, Pretrial Services Violations Summary Report for the 12 Month Period Ending December 31, 2019. Available at <https://www.uscourts.gov/statistics-reports/caseload-statistics-data-tables>.

12. The Defendant respectfully requests a hearing on this motion.

WHEREFORE, the Defendant respectfully requests that the Defendant be released on an order setting conditions of release.

NEIL SURESH CHANDRAN, Defendant,

/s/ David R. Stickman

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